

1 **MCCAULLEY LAW GROUP LLC**
2 JOSHUA V. VAN HOVEN, (CSB No. 262815)
3 E-Mail: josh@mccauleylawgroup.com
3001 Bishop Dr., Suite 300
3 San Ramon, California 94583
4 Telephone: 925.302.5941

4 RICHARD T. MCCAULLEY (*pro hac vice*)
5 E-Mail: richard@mccauleylawgroup.com
180 N. Wabash Avenue, Suite 601
6 Chicago, Illinois 60601
7 Telephone: 312.330.8105

7 *Attorneys for Plaintiff and Counter-Defendant,*
8 SURGICAL INSTRUMENT SERVICE COMPANY, INC.

9 [Additional Counsel Listed on Signature Page]

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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 SURGICAL INSTRUMENT SERVICE
15 COMPANY, INC.

Case No. 3:21-cv-03496-AMO
Honorable Araceli Martínez-Olgún

15 *Plaintiff/Counter-Defendant,*

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17 **PLAINTIFF'S PROPOSED**
MODIFICATIONS TO JURY
INSTRUCTIONS

v.

18 INTUITIVE SURGICAL, INC.,

19 *Defendant/Counterclaimant.*

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1 Pursuant to the Court's request of January 22, 2025 (Dkt. 428), SIS hereby identifies the
2 following jury instructions that are unnecessary for presentation in view of the Court's orders and
3 evidence presented at trial:

- 4 • Disputed Instruction 1
- 5 • Disputed Instruction 4
- 6 • Disputed Instruction 5
- 7 • Disputed Instruction 6
- 8 • Disputed Instruction 15
- 9 • Disputed Instruction 19
- 10 • Disputed Instruction 25
- 11 • Disputed Instruction 41
- 12 • Disputed Instruction 46
- 13 • Disputed Instruction 52
- 14 • Disputed Instruction 53
- 15 • Disputed Instruction 58
- 16 • Disputed Instruction 65
- 17 • Disputed Instruction 66
- 18 • Disputed Instruction 72
- 19 • Disputed Instruction 79

20 Further, Disputed Instructions 31, 50 , and 69 include portions that should be removed in
21 view of the Court's orders and evidence presented at trial. Exhibit A is attached including the
22 originally filed instructions with changes in strikethrough.

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3 Dated: January 24, 2025

By: /s/ Joshua Van Hoven
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7 Joshua V. Van Hoven

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3001 Bishop Dr., Suite 300
San Ramon, California 94583
Telephone: (925) 302-5941
E-Mail: josh@mccaulleylawgroup.com

RICHARD MCCAULLEY (*pro hac vice*)
E-Mail: 180 N. Wabash Avenue, Suite 601
Chicago, Illinois 60601
Telephone: (312) 330-8105
richard@mccaulleylawgroup.com

Attorneys for Plaintiff Surgical Instrument
Service Company, Inc.